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April 15, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

It is our opinion that the FDA should retain its current labeling law. The current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol should appear on all irradiated whole foods.

In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and needed to be disclosed. The material fact has not changed, so the labeling should remain. Reasons include product acceptability, its storage qualities and modified nutrients. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer. Consumers need to know that.

In addition, processing by irradiation causes chemical changes that are not noticeable, but are potentially hazardous. Meat seems to have a higher level of carcinogenic benzene and all irradiated foods contain unique radiolytic products that have never even been tested!

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

We believe that the label should be large enough to be easily read by consumers. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Please consider the newness of this technology and the need to assess the public health effects of widespread use of irradiated foods. We believe that the FDA's labeling requirement should not be permitted to expire.

Sincerely,

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98N-1038

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